

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
JOANN INC., <i>et al.</i> , ¹)	
)	Case No. 25-10068 (CTG)
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 421 & 454

**CERTIFICATION OF
COUNSEL REGARDING APPLICATION
OF DEBTORS FOR ENTRY OF AND ORDER (I)
AUTHORIZING THE EMPLOYMENT AND RETENTION
OF CENTerview PARTNERS LLC AS INVESTMENT
BANKER TO THE DEBTORS AND DEBTORS IN POSSESSION
EFFECTIVE AS OF THE PETITION DATE, (II) APPROVING THE
TERMS OF THE ENGAGEMENT LETTER, (III) MODIFYING CERTAIN
TIMEKEEPING REQUIREMENTS, AND (IV) GRANTING RELATED RELIEF**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On February 13, 2025, the *Application of the Debtors for Entry of an Order (I) Authorizing the Employment and Retention of Centerview Partners LLC as Investment Banker to the Debtors and Debtors in Possession Effective as of the Petition Date, (II) Approving the Terms of the Engagement Letter, (III) Modifying Certain Timekeeping Requirements, and (IV) Granting Related Relief*[Docket No. 421] (the “Application”) was filed under seal with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”). On February 18, 2025, the Debtors filed a redacted version of the Application [Docket No. 454].

2. A hearing on the Application was set to be held on March 6, 2025, at 2:00 p.m. (prevailing Eastern Time) and any objections or responses to entry of the Proposed Order were to be filed and served on the undersigned proposed counsel by February 27, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”), except for the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) whose deadline was extended to March 3, 2025, at 4:00 p.m. (prevailing Eastern Time).

3. Prior to the Objection Deadline, the Debtors received informal comments to the Proposed Order from the U.S. Trustee.

4. The Debtors revised the Proposed Order to address the informal comments received from the U.S. Trustee, and the parties agreed to a revised form of order, a copy of which is attached hereto as **Exhibit 1** (the “Revised Order”).

5. A blackline comparing the Revised Order against the Proposed Order is attached hereto as **Exhibit 2**.

6. The Debtors respectfully request that the Court enter the Revised Order at its earliest convenience

Dated: March 4, 2025
Wilmington, Delaware
/s/ Patrick J. Reilley

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